



CODE OF ETHICS

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1. FOREWORD

MSM PET FOOD SRL, with registered office at VIA DELL'AGRICOLTURA 5, VEROLANUOVA (BS), Tax Code/VAT Number 03137390989, is involved in the production, trade, processing, and distribution of animal feed, feed supplements, zootechnical, and agricultural products in Italy and abroad.

This Code of Ethics defines the fundamental principles, values, and rules of conduct that MSM PET FOOD SRL recognizes as its core guidelines. It aims to ensure that everyone who contributes to the company's goals adheres to them, thereby strengthening its commitment to ethical behavior and the prevention of unlawful and irresponsible conduct.

1.1 Scope

The Code of Ethics is the set of rights, duties, and responsibilities of MSM PET FOOD SRL towards its "stakeholders" (employees, collaborators, suppliers, customers, Public Administrations, etc.).

It represents the set of values, principles, and behavioral guidelines that must inspire all those who, directly or indirectly, permanently or temporarily, establish relationships with the Company or operate in its interest.

For MSM PET FOOD SRL, the Code of Ethics is the core document that illustrates and defines its ethical commitments, which are based on the development of the individual, the centrality of human resources, and the development of the local area in which it operates.

The function of the Code of Ethics is to promote or prohibit certain behaviors and to provide sanctions proportionate to the severity of any committed infractions. Therefore, it represents a compendium of the programmatic and behavioral guidelines that guide the company's existence, serving as an aid and support for the creation and implementation of a valid organizational and management model.

It is, without a doubt, a guideline for economic, social, and relational relationships, with particular attention to areas where crimes may be committed.

1.2 Guarantors of the Application of the Code of Ethics

The administrative body is responsible for supervising the correct application of the Code of Ethics. All Recipients of the Code of Ethics are also given the opportunity to report any non-compliance with this Code.

2. RECIPIENTS

This Code of Ethics applies to all individual and collective entities that establish significant relationships with MSM PET FOOD SRL or whose interests are involved in the company's activities in various ways:

- Members of corporate bodies;
- Employees, internal and external collaborators;
- Customers, suppliers, consultants, and business partners;
- Public and private stakeholders who have relationships with the company.

The Recipients have the obligation to serve as an example for colleagues and promote adherence to the rules. They are required to observe the principles and rules contained in the Code, helping to spread a corporate culture based on integrity, ethics, and respect for current regulations.

They also commit to reporting all violations of this Code of which they become aware.

The company is committed to informing and training the Recipients to ensure a full understanding and application of the Code.

The provisions of this Code are binding for all Recipients.

3. PURPOSE OF THE CODE OF ETHICS

The Code of Ethics serves as a guide for everyone who has relationships with the company, both internally and externally. It aims to:

- Promote a corporate culture based on ethics and integrity.
- Recognize the relevance and binding effectiveness of the ethical principles described below, also in the context of crime prevention.
- Define the values and guiding principles for relationships with stakeholders.
- Indicate the behavioral principles that all Recipients of the Code are required to follow.
- Prevent unlawful behaviors or behaviors contrary to company values, by providing sanctions proportionate to the severity of any committed infractions.

MSM PET FOOD SRL is committed to respecting current regulations, ensuring transparency, fairness, and social responsibility in all activities.

4. ETHICAL AND REFERENCE PRINCIPLES

The principles that inspire MSM PET FOOD SRL are:

4.1 Legality

MSM PET FOOD SRL operates in compliance with national, European, and international laws, sectoral regulations, and signed contracts. It also operates in compliance with this Code and its own Articles of Association. The company requires that every Recipient of the Code follows the same behavior and rejects any collaboration or working relationship with individuals who do not respect the regulations.

4.2 Transparency

Recipients of the Code of Ethics are required to provide complete, transparent, understandable, and accurate information so that stakeholders can make autonomous and informed decisions. All company communication must be clear, complete, and understandable, avoiding ambiguity and misleading information.

4.3 The Centrality of the Person

MSM PET FOOD SRL places the centrality of the person at the foundation of its activities. The company values human resources, promoting respect for dignity, diversity, and human rights, and ensuring equal opportunities and safe and healthy working conditions. Its main objective is to maximize the satisfaction of its collaborators.

The company builds relationships with its staff on the basis of mutual trust and respect for the rights and duties of workers, with the goal of creating a work environment free from any form of abuse, ensuring that authority does not become an exercise of power that is harmful to the dignity and autonomy of the worker.

4.4 Integrity and Fairness

Fairness and moral integrity are an essential duty for all Recipients.

All internal and external relationships must be based on good faith, honesty, and fairness. Recipients are required not to establish any privileged relationships with third parties that result from external solicitations aimed at obtaining undue advantages. It is forbidden to accept or offer improper benefits or gifts of excessive value.

In turn, Recipients must not make donations of money or goods to third parties or offer illicit benefits or favors of any kind.

The belief of acting solely in the company's interest does not constitute a valid reason for violating these binding guidelines.

4.5 Confidentiality

MSM PET FOOD SRL is committed to ensuring the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable data protection regulations.

Recipients are required not to use confidential information, learned in the course of their work, for purposes unrelated to their work, and in any case to always act in compliance with the confidentiality obligations assumed by MSM PET FOOD SRL towards all Stakeholders.

In particular, Recipients are required to maintain the utmost confidentiality regarding documents that may reveal **know-how**.

4.6 Diligence

The relationship between the company and its employees is based on mutual trust: employees and collaborators are therefore required to work to promote the company's interests, in compliance with the values of this Code.

Recipients must refrain from any activity that could be a conflict of interest with MSM PET FOOD SRL's interests, by refraining from pursuing personal interests that conflict with the Company's legitimate interests.

4.7 Impartiality and Equal Opportunities

In its relationships with Stakeholders, and in particular in the selection and management of personnel, in work organization, in the choice, selection, and management of suppliers, as well as in relationships with public bodies and institutions, MSM PET FOOD SRL avoids and rejects any discrimination regarding age, sex, race, sexual orientation, health status, political and trade union opinions, religion, culture, and nationality of its interlocutors.

At the same time, the company promotes integration, encouraging intercultural dialogue, protecting the rights of minorities and vulnerable individuals.

4.8 Traceability

MSM PET FOOD SRL, in order to maintain the traceability of the operations carried out in the course of its activities and service provision, stores all documentation, including in electronic format.

4.9 Workplace Safety

The company MSM PET FOOD SRL is committed to ensuring safe and healthy working conditions for its employees and collaborators, respecting individual dignity, guaranteeing their physical and moral integrity, as well as working conditions that respect the dignity of the person and the principle of fair remuneration.

It is committed to disseminating and consolidating a culture of safety by raising awareness of risks and promoting responsible behavior by all employees and collaborators.

The responsibility of each employee/collaborator towards their colleagues makes the utmost care in preventing injury risks mandatory.

To this end, the technical planning of workplaces, equipment, and processes is based on the highest level of compliance with current regulations regarding health and safety at work.

Furthermore, in accordance with Legislative Decree 81/08, MSM PET FOOD SRL is committed to adopting and periodically updating all measures required by law (Risk Assessment Document, personnel training and information, appointments, etc.).

Each employee/collaborator must pay the utmost attention in carrying out their activities, strictly observing all established safety and prevention measures, to avoid any possible risk to themselves, their colleagues, and third parties.

4.10 Conflict of Interest

MSM PET FOOD SRL does not allow Recipients of the Code of Ethics to be involved in relationships that could lead to a clear conflict of interest, whether it is due to actions carried out:

- by employees and collaborators that lead them to pursue an interest different from the company's mission or that personally benefits them;
- by representatives of customers, suppliers, and Public Administrations that lead them to act in a manner contrary to the fiduciary duties related to their position.

This assessment is made based on current regulations and good practices adopted in the company, also taking into account any professional, family, and administrative relationships. In cases where there may be a suspicion of a conflict of interest, Recipients are required to promptly contact their hierarchical superior so that the company can evaluate, and possibly authorize, the potentially conflicting activity.

In cases of violation, the Company will take every suitable measure to end the conflict of interest, reserving the right to take action to protect itself.

4.11 Unfair Competition

MSM PET FOOD SRL is committed to conducting business solely on the basis of free and fair competition, in full compliance with all applicable laws and regulations.

Each employee must maintain independence of judgment and action in the design, production, pricing, and sale of products and services and avoid even the appearance of plots or agreements with a competitor.

It is illegal to enter into formal or informal agreements with competitors that could prevent, limit, or distort trade.

These agreements may include: agreements to fix prices, rig bids, or divide or allocate markets, territories, or customers.

Antitrust and relevant laws also prohibit:

- Improper monopolization of the market.
- Entering into formal or informal agreements or understandings with suppliers or customers that limit competition.
- Tying products improperly.
- Imposing fixed or minimum resale prices.
- Boycotting specific customers or suppliers.
- Making false or misleading comments about competitors.

4.12 Protection of Company Assets

Each Recipient of the Code of Ethics must protect and respect company assets, safeguarding movable and immovable property, technological resources and IT media, equipment, company vehicles, information, and/or know-how of MSM PET FOOD SRL.

Each employee and collaborator is required to use company assets with due diligence and responsible behavior, and to protect them.

Company assets must be used appropriately and in accordance with the company's interest, preventing third parties from making improper use of them. It is expressly forbidden to use company assets for personal or work-unrelated needs. Conduct that could damage or alter the tools is prohibited, under penalty of financial compensation to the company.

With regard to IT tools, it is expressly forbidden to destroy company software, alter or deteriorate, or intercept or interrupt computer communications. It is also forbidden to illegally access computer systems protected by security measures, or to obtain and disseminate access codes.

To this end, each Recipient of the aforementioned Code must:

- Use company assets according to company policies, scrupulously observing all security programs to prevent unauthorized use or theft.
- Avoid improper use of company assets that could cause damage or reduce efficiency, or in any case be in conflict with the company's interest.
- Maintain the secrecy of confidential information regarding the Company, avoiding disclosing it to third parties.
- Scrupulously comply with what is provided by company security policies, also in order not to compromise the functionality and protection of IT systems.

- Do not send threatening and abusive emails, do not use rude or unprofessional language, do not express inappropriate comments that could offend a person and/or damage the company's image.

Each employee and collaborator is responsible for the protection of the assets and technological resources entrusted to them and has the duty to promptly inform their direct hierarchical superiors of events that are partially damaging to such assets and resources.

4.13 Sustainability and Environmental Protection

MSM PET FOOD SRL has begun a journey to integrate ESG (Environmental, Social, and Governance) sustainability goals into its company strategies and business models.

5. RULES OF CONDUCT

5.1 Internal Relationships

MSM PET FOOD SRL guarantees an inclusive, fair, and respectful work environment for the dignity of every individual. Each employee is required to perform their duties with loyalty, professionalism, and responsibility.

- Mobbing, harassment, abuse of power, and any form of discrimination are prohibited.
- Continuous training is provided to update skills and promote a culture of workplace safety.

The company is also committed to:

- Hiring with a regular employment contract.
- Not employing workers under the age stipulated by law, foreign workers without a residence permit, or with an expired residence permit.
- Basing its relationships with employees and collaborators on dignity and respect.
- Respecting the right of workers to freely associate and bargain collectively.
- Ensuring safe and healthy work environments, means, and equipment, guaranteeing the dissemination of the adopted safety policy and promoting responsible behavior among its employees to support the company's safety policy.

MSM PET FOOD SRL asks its employees and collaborators to carry out their activities with diligence and loyalty in respect of company assets.

Each employee and collaborator is therefore informed about the adoption of this Code of Ethics by receiving a copy upon hiring. They have the right and duty to be informed and are required to align their conduct with the ethical principles that are the basis of MSM PET FOOD SRL's activity.

5.2 Relationships with Other Corporate Bodies

The company's top management and the roles provided by the Articles of Association are required to fully comply with the rules provided by the Articles of Association, current national and community legislation, as well as company regulations and procedures.

5.3 Relationships with the Public Administration

MSM PET FOOD SRL is committed to the utmost transparency and fairness in its relationships with the public administration and local authorities with which it operates.

Relationships with officials are limited to the company's authorized and regularly appointed structures, in strict compliance with legal provisions and regulations, and in respect of the company's integrity and reputation.

MSM PET FOOD SRL is committed to operating with officials of the public administration and local authorities using the appropriate channels and to representing the company's interests and positions in a transparent, rigorous, and consistent manner, avoiding collusive behavior or conflicts of interest.

MSM PET FOOD SRL prohibits its employees and collaborators from:

- Adopting behaviors that could lead to any undue benefit or advantage for the company through the omission, alteration, or falsification of information.
- Adopting any type of behavior contrary to the law; paying or offering, directly or indirectly, payments or material benefits to public employees and officials in order to influence an act of their office to obtain an advantage.
- Granting any type of advantage to public employees or officials.
- Submitting untrue declarations to the public administration during operations provided for in the presentation and reporting of activities subject to financing.
- Allocating any obtained financing to activities or purposes other than those for which it was received.
- Issuing purchase requests that do not correspond to a specific and justifiable need of the company and that are not authorized based on the delegations of MSM PET FOOD SRL.
- Altering in any way the functioning of a computer or telematic system, by intervening on data, information, or programs contained therein, procuring an undue advantage for the company.

5.4 Relationships with Customers

MSM PET FOOD SRL also respects the principles of legality, transparency, fairness, responsibility, and quality outlined in this Code in its relationship with customers.

Therefore, employees and collaborators must:

- Scrupulously observe all legal provisions, regulations, and the provisions of this Code.
- Provide the customer with all requested information on the conditions and terms of contracts relating to the products and services offered, so that the customer has complete knowledge and can act in an informed manner.
- Preserve their independence from internal or external influences.

5.5 Relationships with Suppliers

MSM PET FOOD SRL, by establishing collaboration and working relationships with external suppliers and consultants, requires the utmost respect for the principles and rules of conduct stated in this Code.

The selection of suppliers takes place through transparent procedures based on criteria of quality, cost-effectiveness, and sustainability. It is forbidden to accept gifts or favors that could influence the decision-making process. Suppliers must respect the ethical principles of this Code.

5.6 Relationships with Political, Trade Union, and Professional Organizations

MSM PET FOOD SRL is committed to not engaging in direct or indirect pressure on political, trade union, or professional representatives, including through the Recipients of this Code of Ethics.

It also commits to not discriminating against any political or trade union organization.

It is forbidden to involve the company in any way for political or other purposes.

5.7 Relationships with Supervisory and Control Authorities

MSM PET FOOD SRL is committed to maintaining correct and transparent behavior towards supervisory and control authorities, guaranteeing the availability of all necessary documentation requested for the performance of their activities.

Employees and internal and external collaborators are forbidden from altering, falsifying, or making the requested information incomplete.

5.8 Relationships with the Media: External Communications and Information

MSM PET FOOD SRL is committed to managing its external communication by following the principles of fairness, transparency, and truth, promoting knowledge and acceptance of company policies and the company's programs and projects.

Relationships with the press and media and information outlets are maintained only by expressly delegated individuals and must respect ethical values, protecting minors and rejecting vulgar or offensive messages.

Employees and collaborators cannot make statements without the company's authorization.

5.9 Contributions and Sponsorships

MSM PET FOOD SRL may adhere to requests for contributions only for proposals from non-profit organizations and associations or that have cultural or charitable value.

Sponsorship activities may concern social, environmental, sports, entertainment, and art topics.

5.10 Antitrust Regulations

MSM PET FOOD SRL is committed to strictly respecting national and European regulations on competition.

The company operates in compliance with antitrust regulations, promoting free competition and rejecting anti-competitive practices.

- Prohibition of anti-competitive practices
- Prohibition of abuse of a dominant position
- Collaboration with authorities
- Internal supervision

5.11 Commitment to Preventing and Combating Corruption

MSM PET FOOD SRL is committed to the prevention and anticorruption in all its forms, both active and passive.

Anti-corruption is guaranteed within the company with the following lines of conduct:

- Prohibition of corrupt practices: any form of offering, promising, accepting, or requesting money, goods, services, or other undue advantages is prohibited and considered a corrupt practice, aimed at influencing decisions or obtaining undue personal or corporate benefits.
- Compliance with current regulations
- Transparency in relationships
- Adoption of preventive measures: the company implements internal procedures, controls, and training activities to prevent and detect behaviors contrary to anti-corruption regulations and the principles of this Code.
- Reporting of wrongdoing
- Sanctions for violations

6. DISCIPLINARY SYSTEM AND SANCTIONS

The internal control system is aimed at adopting tools and methodologies to counter potential company risks, in order to ensure compliance with laws and internal provisions and procedures.

The violation of the above compromises the relationship of trust between the company and its administrators, employees, consultants, customers, suppliers, and collaborators.

Violations are immediately and incisively pursued by the company through the adoption of appropriate and proportionate disciplinary measures, up to the possible termination of the employment or collaboration relationship.

Behaviors that violate the Code of Ethics constitute:

- a serious breach for employees, with the sanctions provided for by the national collective bargaining agreement (CCNL) for the sector. In the event that criminal proceedings are pending or a personal liberty restriction measure has been taken against the employee, before adopting the disciplinary measure, the sanction of suspension from service and salary may be adopted, for a duration corresponding to the outcome of the final action or until the end of the duration of the personal liberty restriction measure.
- a just cause for the revocation of the mandate for administrators.
- a cause for immediate termination of the relationship.

7. UPDATING THE CODE OF ETHICS

The Code is updated in the event of regulatory, organizational, or market changes.

8. ENTRY INTO FORCE AND DISSEMINATION

This Code of Ethics comes into force on the date of approval by the deliberative body registered in the Chamber of Commerce, is distributed to the Recipients, and published on the company website.

9. ANTI-CORRUPTION POLICY

MSM Pet Food Srl is committed to ensuring an ethical and compliant environment, preventing and combating all forms of corruption. This commitment is based on the principles of integrity, transparency, and legality, which represent the cornerstones of the company's activities.

General Principles

1. Every form of corruption, active or passive, is prohibited and not tolerated in any context. It is not permitted to offer, promise, accept, or request money, goods, or advantages to obtain undue benefits.
2. Compliance with Laws. The company operates in strict compliance with national and international anti-corruption regulations.
3. Transparency in Relationships. All relationships with partners, suppliers, customers, and the Public Administration must be managed with the utmost transparency and traceability.

Obligations of the Recipients

The Recipients of this policy, including employees, collaborators, consultants, and suppliers, are required to:

- Avoid behaviors that could be interpreted as corrupt.
- Report any episodes of corruption or irregularities of which they become aware.
- Participate in anti-corruption training programs organized by the company.

Preventive Measures

1. Risk Assessment The company conducts periodic analyses of corruption risks to identify and mitigate any vulnerabilities in business processes.
2. Control Procedures Tools and procedures are adopted that ensure the monitoring of company activities and compliance with anti-corruption regulations.
3. Training Specific training programs are organized to raise awareness among Recipients on anti-corruption issues and on how to report any wrongdoing.
4. Management of Relationships with the Public Administration All contacts with the Public Administration must take place in compliance with current regulations and must be duly documented and tracked.

Reporting Channels

The company provides confidential channels to report suspected corrupt behavior anonymously or identifiably. Reports will be handled with confidentiality and without the risk of retaliation for the whistleblowers.

Sanctions

Any violation of the anti-corruption policy is subject to an internal investigation and may lead to the adoption of disciplinary sanctions, up to the termination of the employment or contractual relationship.

Policy Update

This policy is periodically reviewed to ensure its adaptation to current regulations and best practices in anti-corruption.